



Amy L. Alvarez  
Director  
International External and  
Regulatory Affairs  
Suite 1000  
1120 20<sup>th</sup> Street, NW  
Washington, DC 20036

T: 202.457.2315  
F: 281.664.9610  
amy.alvarez@att.com

July 20, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: Implementation of the Telecommunications Act of 1996 – Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115

Dear Ms. Dortch:

Yesterday, Eric Loeb, Davida Grant and I, all of AT&T, met with Tom Navin, Chief of the Wireline Competition Bureau, and Marcus Maher and Nick Alexander of the Bureau staff. The purpose of the meeting was to discuss AT&T's concerns with potential Commission rules that would restrict the foreign storage of CPNI generated in the United States.

We described AT&T's global business services and expressed our concern that a foreign storage prohibition, without certain public-policy based exemptions, would impede AT&T's ability to serve its multinational corporate customers in the manner they demand. Additionally, we raised the concern that a foreign storage prohibition would adversely impact international trade policy and place the US communications industry at a competitive disadvantage in the global marketplace. AT&T urged that any rules restricting the foreign storage of CPNI include a narrowly-tailored exemption for enterprise customers that provide express consent for the trans-border transfer and storage of CPNI as necessary to carry out the terms of the service agreement. This provision would satisfy the legitimate interests in protecting the security and privacy of CPNI, while also allowing trans-border commerce that meets the demands of our communications customers.

One electronic copy of this Notice is being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez", with a stylized flourish at the end.

cc: Tom Navin  
Nick Alexander  
Marcus Maher